

TENNESSEE REGULATORY AUTHORITY

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460 James Robertson Parkway
Nashville, Tennessee 37243-0505

TN REGULATORY AUTHORITY
DOCKET ROOM

MEMORANDUM

TO: Docket File

FROM: Glynn Blanton, Chief 
Gas Pipeline Safety Division

DATE: September 3, 2002

SUBJECT: Docket No. 01-01133 (Application of Nashville Gas Company for a Waiver of Section 192.121 and 192.123 (a) of Part 192 of U.S.C. Title 49)

We are in receipt of the attached letter from the U.S. Department of Transportation, Research and Specials Programs Administration pertaining to a stay and request for additional information in their review and approval of the requested waiver. On August 15, 2002, a copy of this letter was provided to Mr. Jim Thweatt and Mr. John Clark with Nashville Gas Company requesting a response to our agency on or before September 15th.

We would like to request the attached document be place in the docket file folder. If you have any questions regarding this request please advise.

cc: Richard Collier
Randal Gilliam



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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400 Seventh St., S.W.
Washington, D.C. 20590

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Mr. Glynn Blanton
Chief, Gas Pipeline Safety Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Dear Mr. Blanton:

We have considered your letter of June 18, 2002, notifying us that the Tennessee Regulatory Authority (TRA) has approved the application of the Nashville Gas Company (NGC), a Division of Piedmont Natural Gas Company, Inc., for a waiver from 49 CFR §§ 192.121 and 192.123(a). The waiver would permit NGC to operate plastic pipe made of polyamide resin (also known as Nylon 11, PA 11, or Rilsan™) at operating pressures of up to 200 psig, or 100 psig above the current limit under § 192.123(a). The proposed 200 psig limit is based on using a design factor of 0.40, instead of the currently required 0.32, in the design formula in § 192.121.

To properly evaluate the safety of the pipeline system and of the 0.40 design factor, we need more information than your letter or the TRA order provides. Therefore, we object to the waiver, and under 49 U.S.C. § 60118(d), TRA's action granting the waiver is stayed.

We will reconsider our objection if you provide the following information regarding the proposed system:

1. Please indicate the diameters of the PA 11 plastic pipe to be used in the main and service lines.
2. Please indicate the SDR numbers of the PA 11 plastic pipe to be used in the main and service lines.
3. Please indicate the class location of the main and service lines.
4. Please indicate if the waiver is permanent or only for a trial period in conjunction with the Gas Technology Institute study. If the latter, please indicate the length of the trial period.
5. Please indicate if hot taps are to be performed on the PA 11 plastic pipe.
6. Please indicate if TRA staff will be present periodically during the installation of the PA 11 plastic pipe.
7. Please indicate why TRA believes it is safe to use a design factor of 0.40 instead of 0.32 to determine the design pressure of PA 11 plastic pipe.

Sincerely,

461 Stacey L. Gerard
Associate Administrator
for Pipeline Safety